

REMARKS

A review of the claims indicates that:

A) Claims 2—5, 9—12, 26—29 and 32—35 remain in their original form.

B) Claims 1, 6—8, 25, 30 and 31 are previously presented.

C) Claims 13—24 and 36—41 are withdrawn.

In view of the following remarks, Applicant respectfully requests reconsideration of the Restriction and examination of all claims.

Traversal of the §103 Rejections

Claims 1—5, 8—12, 25—29 and 32—35 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Pat. App. No. 2002/0189726, hereinafter “Kloosterman.” In response, the Applicant respectfully traverses the rejection.

Claim 1 recites a processor-readable medium comprising processor-executable instructions for processing a PDF (portable document format) document to produce a PPML (personalized print markup language) template, the processor-executable instructions comprising instructions for:

- opening the PDF document;
- **converting a PDF element within the PDF document into a variable object;**
- selecting a macro containing rules governing operation of the variable object; and
- configuring the PPML template to include a definition of the variable object, the macro and a version of the PDF document, wherein the version of the PDF document is configured as a background element within the PPML template.

Accordingly, Claim 1 recites, in part, “converting a PDF element within the PDF document into a variable object”. The Applicant agrees with the Patent Office that the Kloosterman reference does not teach such a converting step.

1 However, the Applicant respectfully notes that the Patent Office suggests that
2 Kloosterman teaches related elements, and that it would have been obvious to one
3 of ordinary skill to have applied Kloosterman's teachings to convert "a PDF
4 element within the PDF document into a variable object" as recited by the
5 Applicant's claim. The Applicant respectfully disagrees, and presents arguments
6 and remarks below.

7 The Kloosterman Reference.

8 The Kloosterman reference teaches a "Variable Data Printing Dynamic
9 Imposition Template" (see Kloosterman, at the title). Kloosterman addresses the
10 issue that "there remains a need within the art for a method and apparatus that can
11 supply printing device specific data to be used in conjunction with PPML/VDX
12 instances" for variable data printing (see Kloosterman at [0016]).

13 Kloosterman's Claim 1 is provides a basic understanding of Kloosterman's
14 technology. Referring to Kloosterman's Claim 1: a file has parameters, including
15 categories within the parameters, and production parameters can be created from
16 the categories. The printer will have manufacturing capabilities, *and a static
17 imposition template can be used to impose (force) the categories of attributes to
18 conform to the manufacturing capabilities.* That is, the template *maps between the
19 printer's abilities and the documents attributes in categories.* Thus, Kloosterman
20 teaches an "imposition template" (see invention title) that reconciles between the
21 document and the printer.

22 The 'imposition template' is discussed by Kloosterman at [0019].
23 Kloosterman teaches that "a Static Imposition Template is selected and items are
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1 mapped within the categories to attributes of the printing devices as determined
2 from the list of manufacturing capabilities”.

3 Thus, the imposition template of Kloosterman is substantially different than
4 the PPML template recited by the Applicant’s Claim 1 (in the preamble of that
5 claim). The imposition template of Kloosterman maps aspects of the file to be
6 printed to the capabilities of the printer (Kloosterman, end of [0019]). In contrast,
7 the Applicant’s Claim 1 recites instructions to process a PDF document to produce
8 a PPML template, which is ultimately part of the print job.

9 Kloosterman fails to discuss specifics of the authoring process, except in
10 high-level terms such “the graphic designer who adds variable content to static
11 content using a utility within VDP composition 12, to add variable content to
12 traditional static designs produced by applications such as Quark™”. In
13 particular, Kloosterman fails to teach how a PPML template is produced.
14 Kloosterman simply assumes that the template will be created by a conventional
15 design application. This is not surprising, since Kloosterman is interested in
16 technology integrating a conventionally produced print job with the printer’s
17 capabilities (see [0017], last several lines). Note that at line 6 of paragraph [0033],
18 Kloosterman says, “an authoring application is required to author PPML/VDX
19 job.” Kloosterman suggests that NexPress program be used. However,
20 Kloosterman does not teach or suggest (other than to suggest use of an appropriate
21 application) how to create a PPML template. And, since he does not discuss the
22 larger topic, Kloosterman does not teach or suggest the specific implementation of
23 “converting a PDF element within a PDF document into a variable object”, as
24 recited by the Applicant’s claim.
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1 Thus, the Kloosterman reference teaches that variables are created by
2 conventional applications configured to create a PPML/VDX job (Kloosterman at
3 [0031], [0032] and [0033]). Accordingly, Kloosterman does not suggest that an
4 element within a PDF file could be turned into a variable.

5 Use of the term “template” in Kloosterman.

6 The Kloosterman reference appears to use the term “template” in two areas.
7 Thus, there is confusion on the basic terminology used. First, in paragraphs
8 [0033] and [0039], the term “template” is used to mean a PPML template or
9 similar, which is the sense in which the Applicant uses the term. That is, a
10 template that includes images, graphics and text. However, at [0033] and [0039],
11 Kloosterman does not teach how variables are formed in such “templates,” which
12 is the topic of the second paragraph after the preamble of the Applicant’s Claim 1.

13 At all other locations, the Applicant believes that Kloosterman refers to
14 template as the mapping means used in the last paragraph of Kloosterman’s Claim
15 1. For example, at [0109], Kloosterman teaches that the template is essentially
16 rules for mapping pages onto sheets of media. At [0109], Kloosterman says, “A
17 Static Imposition Template essentially constitutes a set of rules for mapping the
18 pages of Instance Documents...”. This is a different meaning than the “template”
19 that a graphical artist creates, which is the meaning used by the Applicant.

20 Note that an imposition template is a term of art in the printing industry,
21 and is related to mapping out the locations on a piece of paper that are printed on.
22 See, <http://en.wikipedia.org/wiki/Imposition> This is much different than a
23 template that is a sort of stencil, pattern, ‘starting point’ or ‘skeleton’ upon which
24 other data is added. Thus, Kloosterman is talking about a type of template, the
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1 imposition template, which is much different than a PPML template (to which
2 different variables may be added).

3 The Patent Office suggests (see bottom of page 4 and page 5 of the Office
4 Action mailed 09/06/2007) that Kloosterman does not teach “converting a PDF
5 element within a PDF document into a variable object”. The Applicant
6 respectfully agrees. However, the Patent Office suggests that Kloosterman
7 teaches:

- 8 • Variable data printing generally (top two lines of page 5 of the
9 Office Action).
- 10 • That variable data printing allows creation of manufactured pieces
11 with variable elements (lines 2—5 of page 5).
- 12 • That a database can supply the variable values (lines 5—7).
- 13 • That PPML speeds the RIP process by reusing Ripped objects (lines
14 8—9).
- 15 • That objects and be named and reused (lines 9—13).
- 16 • That the overall size of a PPML/VDX document is reduced due to
17 utilization of VDX, and that compound elements may be defined
18 once and referenced many times.

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20 The Applicant respectfully submits that, even if the above is taught by
21 Kloosterman, none of the above teachings suggest: (1) the general topic of
22 creating a PPML template; and, (2) the more specific topic of converting a PDF
23 element within a PDF document into a variable object (as recited by the claim).

1 In fact, Kloosterman teaches away from using a PDF document in the
2 process of creating the PPML document, since Kloosterman teaches that
3 NexTreme™ should be used (lower half of [0031]). Kloosterman does teach that
4 the variable *values*, (which are inserted into the variables), are PDF files. Thus, a
5 PDF is put into a variable. See Kloosterman at [0034], [0035] and [0036].
6 Realize, that the “graphical box” of line 17 of [0033] is the variable, and that the
7 PDFs (e.g. Lexus.pdf) are the values put into the variable.

8 Again, Kloosterman teaches communicating between PPML/VDX
9 instances and a printing device (see Kloosterman at [0016]). Kloosterman’s
10 “invention is a VDP prepress workflow component that provides the prepress
11 operator with the ability to analyze and view the data of the VDP Job, then setup
12 the job within the digital press environment such that the VDP Job can be
13 optimally produced” (last part of [0017]). Kloosterman does not teach or suggest
14 a way to create a PPML template, and does not teach or suggest changing a PDF
15 element to a variable. Kloosterman teaches and suggests that known authoring
16 programs are used to create the PPML/VDX file (see [0031]).

17 The Patent Office suggests that Kloosterman’s teaching suggest converting
18 a PDF element into a variable, because “it would have provided the capability for
19 facilitating the mapping of attributes of the author’s artistic intent for the printed
20 and finished work represented in a VDP Job to the physical capabilities of the
21 selected device”. The Applicant respectfully submits that nothing in Kloosterman
22 teaches or suggests turning a PDF element into a variable. Kloosterman teaches
23 that an off-the-shelf (known) VDP authoring application is used. See [0031], first
24 several lines. Moreover, any person of ordinary skill in the art would have
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1 followed the teachings of Kloosterman—that is, such a person would have used an
2 authoring application (see [0033]) which created the PPML job in a conventional
3 manner.

4 In view of the remarks above, the Applicant respectfully submits
5 Kloosterman is deficient to support the Section 103 rejection. Accordingly, the
6 Applicant respectfully requests that the Section 103 rejection be removed.

7 **Claims 2—12** depend from Claim 1 and are allowable as depending from
8 an allowable base claim, as well as for their recitation of elements not seen in the
9 prior art of record. These claims are also allowable for their own recited features
10 that, in combination with those recited in Claim 1, are neither taught nor suggested
11 in references of record, either singly or in combination with one another.

12 **Claim 25** was rejected without specificity as being similar to Claim 1. The
13 Applicant notes that Claim 25 recites, “means for converting a PDF object within
14 the PDF document into a variable object”. Accordingly, the Applicant submits
15 that Claim 25 is allowable for at least the reasons that Claim 1 is allowable, and
16 incorporates those arguments herein by reference.

17 **Claims 26—35** depend from Claim 25 and are allowable as depending
18 from an allowable base claim, as well as for their recitation of elements not seen in
19 the prior art of record. These claims are also allowable for their own recited
20 features that, in combination with those recited in Claim 25, are neither taught nor
21 suggested in references of record, either singly or in combination with one
22 another.

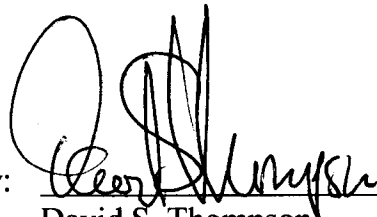
23 **Conclusion**
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1 For at least the above-identified reasons, the Applicant respectfully submits
2 that the references are deficient to support the Section 103 rejections of the
3 Claims. Accordingly, the Applicant respectfully requests that the claims be
4 allowed to issue in their current form.

5 The Examiner is urged to contact the undersigned if any issues remain
6 unresolved by this Response, or for purposes of discussing the claims, the prior art
7 or for any other purpose.

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9 Respectfully Submitted,

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11 Dated: 06 MAR '08

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